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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

DONALD L. RIVERA, an individual;
DAN TRUJILLO, an individual; and
JENNY ARCHULETA, an individual,
JESSE BOWMAN, an individual,

Plaintiffs,

v.

SALT LAKE COMMUNITY COLLEGE, a
higher education institution and political
subdivision of the STATE OF UTAH; REED
STRINGHAM, III, an individual; and
CONSTANCE HUGHES, an individual, and
COLLEGIS, INC., a Delaware Corporation,

Defendants.

**CONSTANCE HUGHES'
MOTION FOR RULE 54(b)
CERTIFICATION**

Case No. 2:03 CV 00764DB
(Lead Case)
Judge: DEE BENSON

Defendant Constance Hughes, by and through counsel, Rebecca S. Parr, Assistant Utah Attorney General, moves this Court, pursuant to Rule 54(b) of the Federal Rules of Civil

Procedure, to find that there is no just reason for delay of the entry of final judgment and to enter final judgment against the plaintiffs Rivera, Trujillo, Archuleta and Bowman in this matter.¹

The grounds for this motion are 1) on June 8, 2005, the Court granted the *Motion to Dismiss Defendant Constance Hughes* (docket no. 18) (joined in *Defendant Reed Stringham's Motion to Dismiss*, docket no. 16); 2) only claims against Defendant Salt Lake Community College and other individual defendants remain in the consolidated cases; 3) a Rule 54(b) certification will produce finality as to Ms. Hughes; and 4) a Rule 54(b) certification will ease appellate review, if necessary.

This motion is supported by the accompanying *Memorandum In Support of Constance Hughes' Motion for Rule 54(b) Certification*, and a proposed *Rule 54(b) Judgement in Favor of Constance Hughes*.

DATED this 13th day of February, 2008.

/s/ Rebecca S. Parr

REBECCA S. PARR
Assistant Attorney General
Attorney for Defendant Constance Hughes

¹ Judge Cassell previously granted Ms. Hughes' motion for Rule 54(b) certification and entered judgment in Johnson v. Salt Lake Community College, et al., Civil No. 2:03-cv-1050PGC (docket no. 47).

CERTIFICATE OF SERVICE

I hereby certify that on February 13, 2008, I electronically filed the foregoing **CONSTANCE HUGHES' MOTION FOR RULE 54(b) CERTIFICATION** with the Clerk of the Court using the CM/ECF system, which sent notification of such filing to the following:

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